

12:17 pm, Jul 19 2024

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY _____ Deputy

ATTACHMENT A
STIPULATION OF FACTS

The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

On May 6, 2022, Baltimore Police officers observed a 2004 Oldsmobile Alero with Maryland license plate number 3EP5751 displaying an inoperable third brake light and tag light, and expired registration. Officers conducted a traffic stop in the 1700 block of Ramsay Street. The vehicle's driver and sole occupant, Jermaine Washington, quickly exited the vehicle and attempted to walk away. The Defendant was ordered to return to the vehicle and complied, however he could not re-enter the vehicle as he had locked himself out.


Officers identified the Defendant and determined he had an active, confirmed warrant for domestic assault. The Defendant was then arrested. Officers examined the interior of vehicle using a flashlight (looking through windows) and observed – among other items – a handgun in plain view on the driver's-side floorboard.

Officers entered the vehicle and recovered – among other items – a Sig-Sauer .40 caliber firearm, serial number 24B176298, loaded with 12 rounds of ammunition. The following day on May 7, 2022, the Defendant made a recorded telephone call from a local detention facility in which he stated to an associate, "I did it again. And they got my fucking gun."

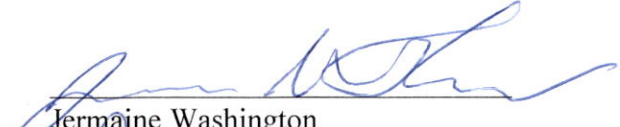
The above Sig-Sauer handgun was a firearm as defined in 18 U.S.C. § 921(a)(3). The firearm was also not manufactured Maryland and therefore affected interstate commerce prior to its recovery on May 6, 2022. The Defendant agrees that at the time he possessed this firearm, he knew he had previously been convicted of armed robbery in August of 2006 and again in July of 2013 in Maryland state court; armed robbery is punishable by a term of imprisonment exceeding one year in Maryland.

All events occurred in the District of Maryland.

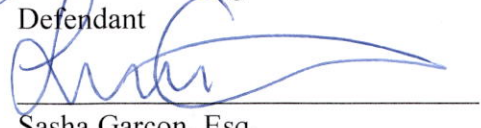
SO STIPULATED:



Steven T. Brantley
Assistant United States Attorney



Jermaine Washington
Defendant



Sasha Garcon, Esq.
Counsel for Defendant